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COLORADO DEPARTMENT OF HEALTH

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October 1, 1990

Roy Romer
Governor

Thomas M. Vernon, M.D.
Executive Director

Mr. Jim Koffer
Project Manager
EG&G, Rocky Flats Inc.
Rocky Flats Area Office
P.O. Box 928
Golden, CO 80402-0928

RE: Comments on 881 Hillside Restoration Phase 1-B; Project Management Plan, Work Procedures, Quality Assurance Project Plan, and Site Specific Health and Safety Plan for Construction. August 1990.

Dear Mr. Koffer:

The Colorado Department of Health, Hazardous Materials Waste Management Division has reviewed the document identified above.

The poor copy quality of the Construction Work Procedures makes reviewing this section impossible. The daily safety and plan-of-the-day meetings is a good practice. A brief summary of the meeting contents should be noted in the construction log.

An expanded list of acronyms would be helpful. QA, EMAD, QAO, GFE, HSC, FPM, NEPA, GHS-SUP, OHST, TBD, DES-21, QAPP, NCR might be included.

The UNC-Geotech Health and Safety plan is incongruous at the bottom of page 18 and the top of page 19. The missing information forms a substantial gap in the radiological monitoring data base.

The meteorological data tables are completely unreadable.

Section 11, Emergency Response Plan for UNC-Geotech, (page numbers obliterated.) The emergency phone number list is posted next to the site map. Where is the site map located?

The locations of key pieces of emergency response equipment, the telephone, first aid kits, eye washes, and fire extinguishers are listed as TBD. Since this is the "site specific 881 Hillside" health and safety plan the locations of these pieces of equipment should be listed and construction personnel should know where they are.

The actual numerical values for the site anemometer and windspeed shutdown criteria should be stated since this is a site and phase specific health and safety plan.

An actual schedule of test equipment calibration should be stated. How often will calibration occur?

DOCUMENT CLASSIFICATION
REVIEW W/AVR PER
CLASSIFICATION OFFICE

The intention of moving from "generic site wide health and safety plans" to "site and phase specific health and safety plans" is twofold. First, the amount of work required to produce a health and safety plan is reduced, by eliminating the segments unnecessary for a particular activity. Secondly, flexibility is gained in setting criteria appropriate for the activity. In a site and phase specific plan, all generic statements should be replaced with appropriate numerical values. For example, in the Construction work procedures, under Construction Coordinator, the last line reads, "The Construction Coordinator shall also monitor the site anemometer and stop work according to wind speed shutdown criteria." The wind speed shutdown criteria should be stated. Is the purpose of this criteria to minimize the equipment being toppled by high winds, or to prevent contaminated dust from being inhaled? The Phase I-B health and safety plan suffers from being too generally generic and is not sufficiently site or activity specific. The Phase I-A health and safety plan final version does not suffer the generally generic affliction.

We appreciate the opportunity to comment on this document. If you have any questions please contact Noreen Matsuura at 331-4920.

Sincerely,

A handwritten signature in cursive script, reading "Gary W. Baughman". The signature is fluid and extends to the right.

Gary W. Baughman
Unit Leader
Hazardous Waste Facilities
Hazardous Materials and Waste Management Division

cc: Patricia Corbetta, EPA
Martin Hestmark, EPA
Tom Olsen, DOE
Teresa Hampton, AGO
Joan Sowinski, CDH

GB/NM/nm